



P.O. Box 400, Grand View, ID 83624
P 800.274.1516 F 208.834.2919

January 31, 2019

Ms. Natalie Creed
Hazardous Waste Unit Manager
Waste Management and Remediation Division
Idaho Department of Environmental Quality (IDEQ)
1410 North Hilton
Boise ID, 83706-1255

**RE: US Ecology Idaho, Inc. (USEI) – IDD073114654
Permit Condition I.V. and II.U.1.– 2018 Fourth Quarter Discrepancy Report**

Dear Ms. Creed:

There were several minor discrepancies or items not requiring 24-hour reporting as outlined in Permit Condition I.V. and II.U.1. that occurred during the fourth quarter of 2018.

USEI is required to perform inspections and maintain records in accordance with Permit Conditions II.E., V.A.7., VIII.A.2, and I.AA. and Attachment 4 of USEI's RCRA Part B Permit. Due to the incident on November 17, 2018, USEI's inspection record is currently incomplete. The following is a summary of USEI's current inspection record:

The following facility inspections were completed and are located in administrative areas of the facility but have not been recovered due to the inability of USEI personnel to safely access them. Some of these records may have sustained damage during the November 17, 2018 incident. USEI will notify the Department upon recovery:

- Figures F-3, F-4e, F-4f, F-4g, F-4h, and F-4i for November 16th
- Figures F-6, F-19, F-20, F-21, and F-22 for November 15th – 16th
- Figures F-5 and F-12 for November 14th – 16th
- Figures F-2, F-4, F-4d, F-4j, F-8, F-9, and F-15 for November 12th – November 17th
- Figure F-11 and Figure F-24 for November 1st – 16th

The following facility inspections are required during a normal working day, but may not have been completed at the time of the November 17, 2018 incident. Some of these records may or may not be recovered as clean-up operations resume. USEI will notify the Department if recovered:

- Figures F-1, F-2, F-3, F-4e, F-4f, F-4g, F-4h, F-4i, F-5, F-6, F-8, F-11, F-12, F-19, F-20, F-21, F-22, and F-24



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The following facility inspections were stored in an office behind the Containment Building and are believed to have been destroyed in the November 17, 2018 incident. USEI does not anticipate recovering these records:

- Figure F-2a for the week of November 12th – 17th
- Figure F-7 for November 16th – 17th

Following the November 17, 2018 incident some facility inspections could not be completed due to the inaccessibility of sampling equipment and/or restriction of facility access:

- Figures F-3, F-4e, F-4f, F-4g, F-4h, and F-4i could not be completed on November 19, 2018 due to lack of power to facility pumps and access to the facility's "bubbler". The "bubbler" was located in a building that had not been cleared for personnel access.
- On November 20, 2018 the facility was inaccessible for inspection by USEI personnel due to the removal and over-packing of Magnesium Fine drums at the Containment Building.
- On November 21, 2018 the facility's "bubbler" was retrieved, but was found to be damaged in the November 17, 2018 incident. Power was restored to portions of the facility, including to landfill leachate pumps. Primary and secondary levels for Cells 15 and 16 were measured and documented on Figures F-4g and F-4i. Primary leachate levels were measured for Cell 14-1 and documented on Figure F-4e, but secondary levels were unable to be measured. Primary and secondary levels for Cells 14-2 and 5 were unable to be measured and documented on Figures F-4f and F-4h.
- The "bubbler" was repaired for use on November 23, 2018, and all liquid levels for the landfills and surface impoundments were measured.
- Figure F-18, Past Practice Carbon Unit Inspection (Monthly), was not completed for the month of November 2018 due to the inaccessibility of sampling equipment. The sampling equipment was underneath debris in one of the administration buildings, and USEI personnel were not cleared to enter the structure. A visual inspection of the units was performed and all units appeared intact and undamaged. Sampling was performed on December 31, 2018, and all readings were below 50ppm.

All other inspections were performed per the frequency required in Table F-1. Table F-1, USEI's Inspection Schedule, has been included for your reference.

In accordance with Permit Condition XI.A.1., and Attachments 4, 14, and 24 of USEI's RCRA Part B Permit, USEI is required to remove spilled or leaked wastes and accumulated liquid from the secondary containment systems of the Containment Building within 24-hours of discovery. Access to the Containment Building has been restricted for USEI personnel due to overhead hazards. As such, the LCR/LDCR systems of the Containment Building have not been inspected since the November 17, 2018 incident and any potential liquids have not been removed. USEI personnel were allowed limited access on January 23, 2019 to remove rainwater accumulation from collection trenches in front of the Containment Building.

In accordance with Permit Condition II.I. and 40 CFR § 264.71(a)(2)(A), USEI is required to submit the top copy and any continuation pages of a Hazardous Waste Manifest to the EPA's e-Manifest system within thirty days of receipt. Following the November 17, 2018 incident several manifest copies were not uploaded to the system within the required timeframe. USEI personnel were not permitted to access and retrieve manifest copies immediately following the incident. All manifest copies have now been retrieved and uploaded into the e-Manifest system.

In accordance with Permit Condition II.I.2, USEI is required to submit an Unmanifested Waste Report to the Department within 15-days of receipt of unmanifested waste. Enclosed is an Unmanifested Waste Report for a manifest received by USEI on November 15, 2018 which listed an incorrect EPA ID number in section eight (Designated Facility's U.S. EPA ID Number) of the manifest. The manifest was not accessible following the November 17, 2018 incident.

In accordance with Permit Condition II.F., Attachment 5 of USEI's RCRA Part B Permit, and 40 CFR §§ 264.16(a)(4) and 264.16(c), USEI is required to provide annual training to all employees. At the time of the November 17, 2018 incident, ongoing 8-Hour HAZWOPER Refresher training was being provided to all USEI staff. The following employees did not receive annual 8-Hour HAZWOPER training for 2018:

- Jason Evens, General Manager
- Robynn Hall, Chemist
- Jennifer Lutrell, Customer Service Specialist
- Elizabeth Schwager, HR Generalist
- Richard Theodozio, Senior Operator

USEI plans to provide an 8-Hour HAZWOPER Refresher training to the above-listed employees by the end of March. Mr. Theodozio has since left the employment of USEI and will not be included in the training.

There were no other discrepancies noted during the fourth quarter at USEI.

As discussed with your staff, manifest discrepancies are not included in this report as per the reporting requirements mandated under IDAPA 58.01.05.008, and 58.01.05.012 [40 CFR §§ 264.71, 264.72, and §270.30(l)(7)].

If you have any questions or comments, please feel free to contact me or Rebecca Hogaboam at (208) 834-2275.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,



Jason Evens
General Manager

cc: Lon Stewart – IDEQ
Barbara McCullough– EPA Region X

Attachments

Attachments

Unmanifested Waste Report



P.O. Box 400, Grand View, ID 83624
P 800.274.1516 F 208.834.2919

January 31, 2019

Ms. Natalie K. Creed
Hazardous Waste Unit Manager
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Re: US Ecology Idaho, Inc., (USEI) IDD073114654 – *Unmanifested Waste Report*

Ms. Creed:

This letter is to report an unmanifested load received at US Ecology Idaho, Inc. as outlined in Permit Condition II.I.2 and per the requirements of IDAPA 58.01.05.008 {40 CFR Part § 264.76}. A copy of the original manifest is enclosed for your review. The following information is provided as required:

- (1) **EPA ID. No. , Name, Address of Facility:**
IDD073114654
US Ecology Idaho, Inc.
20400 Lemley Road
Grand View, ID 83624
- (2) **Date of Waste Receipt:**
November 15, 2018
- (3) **EPA ID Number, Name, Address of Generator/Transporter:**
TXP490354053
Landstar Inway, Inc.
IH 10 W Near MM 709
Sealy, TX 77474

TXR000083184
Masters Advanced Remediation Services, Inc.

MIK435642742
EQ Industrial Services

ALR000007237
Action Resources
- (4) **Description/Quantity of Unmanifested Waste Received:**
Manifest Section 9b, Line 1:
Seventeen (17) pallets with thirty-two (32) pails; One (1) pallet with thirty-eight (38)

pails, Chromium Trioxide, (D001) (D002) (D007)

Manifest Section 9b, Line 2:
Seventeen (17), DF, Chromium Trioxide (D001) (D002) (D007)

- (5) **Method of Treatment, Storage or Disposal:**
Stabilization
- (6) **Certification:**
Certification provided below.
- (7) **Explanation of Why the Waste was Unmanifested:**
Section 8 (Designated Facility's EPA ID Number) of the manifest was incorrect.

If you have any questions or comments, please contact me or Rebecca Hogaboam at (208) 834-2275.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Regards,



Jason Evens
General Manager

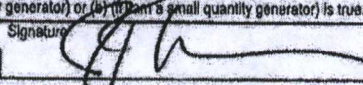
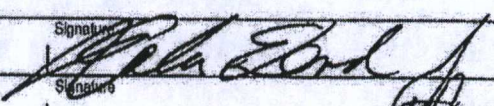
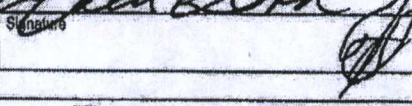
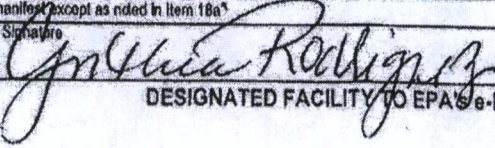
Attachments

cc: Lon Stewart, IDEQ

Please print or type.

Form Approved, OMB No. 2050-0039

1811505550 TRI 3812

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TXB490354053	2. Page 1 of	3. Emergency Response Phone 877-419-7806	4. Manifest Tracking Number 019345448 JJK		
5. Generator's Name and Mailing Address Landstar Inway, Inc. 13410 Sutton Park Dr. S Jacksonville, FL 32224-5270 USA			Generator's Site Address (if different than mailing address) Incident Location: IH 10 W near MM 709 Sealy, TN 37474 USA				
6. Transporter 1 Company Name Masters Advanced Remediation Services, Inc.			U.S. EPA ID Number TXR000083184				
7. Transporter 2 Company Name EQ Industrial Services			U.S. EPA ID Number MIK 435 642 742				
8. Designated Facility Name and Site Address US Ecology Idaho, Inc. 20400 Lemley Rd Grand View, ID 83624 USA			U.S. EPA ID Number IDDD73114654				
Facility's Phone: 800-274-1515							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
		1. UN 1463 Waste Chromium Trioxide C5.1 (6.1+8) PII, RQ 10, 17 pallets with 36 pals, 1 pallet with 38 pals... SDS on file	18	CW	39000	P	G7C3 319H D007 D001 D002
		2. UN 1463 Waste Chromium Trioxide C5.1 (6.1+8) PII, RQ 10, 17 DP with 2 pals overpack due to container thermal stress, but not breached... SDS on file	17	DF	2210	P	G7C3 319H D007 D001 D002
		3.					
		4.					
14. Special Handling Instructions and Additional Information Profile #: USE 47523-0 Job #: 375-18 / PO # 18-1103 (RA# 82179)							
15. GENERATOR/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's/Officer's Printed/Typed Name: Joel Calfee (agent) Signature:  Month: 10 Day: 18 Year: 2018							
INTL	16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: NOLAN HERMON Signature:  Month: 10 Day: 18 Year: 18 Transporter 2 Printed/Typed Name: Tamir Salazar Signature:  Month: 10 Day: 26 Year: 10						
TRANSPORTER	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection WS 10 47523-0 per schedule, Sec. 9a, line 2 Sec. 8 TSD of EPA Id. Shown as IDDD73114654 per CS 11.5.18						
	18b. Alternate Facility (or Generator) Facility's Phone: _____ Manifest Reference Number: _____ U.S. EPA ID Number: _____						
DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator) Month: _____ Day: _____ Year: _____						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H132 2. H132 3. _____ 4. _____						
	20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a. Printed/Typed Name: Graciela Rodriguez Signature:  Month: 11 Day: 15 Year: 18						

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator ID Number

TXP480354053

22. Page

23. Manifest Tracking Number

019345448 JJK

24. Generator's Name

LAKE STAR 10W424
13410 SUTTON PARK DR. DEL S
JACKSONVILLE FLA 32224

25. Transporter Company Name

Actian Resources

U.S. EPA ID Number

ALC000007237

26. Transporter Company Name

U.S. EPA ID Number

27a. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

28. Containers

No.

Type

29. Total Quantity

30. Unit Wt./Vol.

31. Waste Codes

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Robert Fischer

Signature

Robert Fischer

Month Day Year

10 29 18

34. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

Table F-1

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
Container Management Units	Spills, equipment, structural integrity of containers	Normal Working Day (Fig. F-1, F-5, F-6, F-7, F-19, F-20, F-21, F-22)
Waste Water Tank Systems	Spills, structural integrity, volumes	Daily (Fig. F-2)
Waste Water Storage Tanks - Wall Thickness	Corrosion, erosion, delamination, disintegration Ultrasonic Thickness Tests	Every 3 years
Mix Bin Tanks MBT-1,2, 3, 4 (Inside Containment Building)	Secondary Leak detection system, volume of liquid removed, structural integrity, spills	Normal Working Day ^{1,2} (Fig. F-2a)
Mix Bin Tanks MBT-1, 2, 3, 4 (Inside Containment Building)	Structural Integrity	Every 3 years
Surface Impoundments	Liquids in leak detection system	Normal Working Day ^{1,2} (Fig. F-3) and after 1/2" in a 24-hour storm
Landfill Areas	Integrity, cover, liner, accessibility, safety, dust, collected water, excess liquids in primary leachate collection/secondary leachate detection systems	Weekly and after 1/2" in a 24-hour storm (Figs. F-4, F-4d, and F-4j) Monthly and after 1/2" in a 24-hour storm (Figs. F4a, b, and c)
	Primary leak detection systems	Weekly and after 1/2" in a 24-hour storm (Figs. F-4e,f,g, and h) Daily (Fig. F-4i)
	Secondary leak detection systems	Normal Working Day ^{1,2} (Figs. F-4e,f,g, h, and i)
Stabilization Facility	a.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck processing and waste handling/storage areas. b.) Integrity of containment ramps c.) Liquids in containment areas	Normal Working Day ^{1,2} (Fig. F-5)
Containment Building (Debris portion)	Spills, accessibility, equipment, structural and container integrity, dust emissions, liquids in LDCRS	At Least Weekly(Fig. F-6)
	a.) Spills, accessibility, housekeeping; inspect the entry ways/exits for accessibility, check for spills in truck	Normal Working Day ^{1,2} (Fig. F-6)

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
	<p>processing and waste handling/storage areas.</p> <p>b.) Integrity of containment ramps, overhead doors, entry-ways and exits.</p> <p>c.) Liquids in collection trenches, grating over collection trenches intact; remove and manage any pumpable liquids in accordance with Permit Condition II.E and the WAP, check integrity of grating over collection trenches.</p> <p>d.) Process equipment; inspect size reduction system and process equipment to ensure that inlets and screens free of tramp materials, grates secured, belt guards in place.</p> <p>e.) Liquids in LCRS and LDCRS; inspect the primary and secondary leak detection collection and removal systems for liquids, remove and manage any pumpable liquids.</p> <p>f.) Inspect the steel bin(s) for tears or cracks</p>	
	a.) Annual inspection and maintenance of mixing bin(s)	Annual
Crusher System	<p>a.) Obstructions, Spills, housekeeping, guards in place, structural integrity of feed conveyor</p> <p>b.) Guards, oil levels proper, spills, housekeeping, structural integrity</p> <p>c.) Air compressor, pressure drop indicator, bag house operational</p> <p>d.) Emergency stop, and sirens operational</p> <p>e.) Housekeeping, spills in loading area</p>	<p>Daily when in use</p> <p>Normal Working Day^{1,2}</p> <p>(Fig. 6a)</p>
Containment Building (Stabilization portion)	<p>a.) Inspect Dust Collection System for equipment integrity and function</p> <p>b.) Inspect liquids in LCS and LDCRS collection system integrity.</p>	At Least Weekly (Fig. F-7)
	c.) Spills, accessibility, housekeeping; inspect the entry ways/exits for	Daily when in use Normal Working Day ^{1,2}

Table F-1 Inspection Schedule

Location	Potential Problems	Minimum Frequency (Typical Figure Reference)
	<p>accessibility, check for spills in truck processing and waste handling/storage areas.</p> <p>b.) Integrity of containment ramps.</p> <p>c.) Liquids in containment areas.</p> <p>d.) Liquids in LCS and LDCRS; inspect the primary and secondary leak detection collection and removal systems for liquids.</p> <p>e.) Operation of APC equipment.</p> <p>f.) Inspect the visible concrete wear surface associated with the primary liner for cracks, gaps, corrosion, or deterioration.</p> <p>g.) Inspect the steel wear plates for tears or cracks.</p>	(Fig. F-7)
	<p>a.) Annual inspection and maintenance of the mixing bins.</p> <p>b.) Inspect bottom steel wear plates for distortion and exposure of supporting media.</p>	Annual
HEPA Filter at Containment Building	Filter integrity	Annual
Vehicle Wash	Sumps leaking/full, controls/valves not working, equipment damaged, drainage inadequate	Normal Working Day ^{1,2} (Fig. F-8)
Roads, Drainage, Run-on/run-off	Malfunction, blockage, integrity spillage	Weekly and after 1/2" in a 24-hour storm (Fig. F-9)
Gates/Fence	Functional, damage, deterioration	Monthly (Fig. F-10)
Yard and Truck Scale Areas	Spills, mechanical or electrical failure, damage, or deterioration	Normal Working Day ^{1,2} (Fig. F-11)
Staging/Unloading/Loading Areas	Accessibility, spills, integrity	Normal Working Day ^{1,2} (Figs. F-12, F-19, F-20, F-21, F-22)
Monitoring Wells	Unlocked, tampering	Monthly (Fig. F-13)
Contingency Plan – Response Equipment (radios, etc.)	Functional	Monthly (Fig. F-14)
Past Practice Units	Integrity	Weekly (Fig. F-15)
Past Practice Carbon Units	Carbon System Integrity	Monthly (Fig. F-18)
Leachate Treatment and Piping System	Pipe and support system integrity, system non-operational, spillage	Normal Working Day ^{1,2} (Fig. F-24)

¹ Performed only for those equipment/areas in use during the day of the inspection.

² A Normal Working Day is defined as any scheduled working day (excluding weekends and holidays) where waste management activities occur at the facility.

UNCONTROLLED